

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
GARY TAYLOR
3 State Bar No. 11031C
Assistant Federal Public Defender
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577
(Fax) 388-6261
6
Attorney for Petitioner

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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 LARRY EDWARD ADAMS,
11 Petitioner,
12 vs.
13 RENEE BAKER, et al.,
14 Respondents.

Case No. 2:98-cv-1441-KJD-PAL

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME**

(Death Penalty Case)

15 Petitioner, by and through counsel, GARY TAYLOR, hereby moves this Honorable
16 Court for a fourteen (14) day enlargement of time, up to and including Tuesday, March 6,
17 2012, in which to serve and file a reply to Respondents' Response to Motion to Alter of
18 Amend Judgment (Docket No. 263). The response is currently due on February 21, 2012.

19 This motion is made and based upon the provisions of Rule 6(b) of the Federal Rules
20 of Civil Procedure and the attached declaration of counsel. This is Petitioner's first request
21 for an extension of time in which to file a reply and is made in good faith and not for
22 purposes of delay.

23 Respectfully submitted this 17th day of February, 2012. .

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25 RENE L. VALLADARES
Federal Public Defender

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27 /s/ Gary A. Taylor
GARY A. TAYLOR
28 Assistant Federal Public Defender

DECLARATION

Gary Taylor declares as follows:

1. I am an attorney at law, admitted to practice before this Court, employed as an Assistant Federal Public Defender. I represent petitioner Larry Edward Adams in this matter.

2. I am an attorney licensed in the State of Texas since 1986. I am board certified in criminal law. I am also licensed in the State of Nevada pursuant to Nev. Sup. Ct. Rule 49.11.

3. As an Assistant Federal Public Defender, I assist and supervise other attorneys in the investigation and preparation of petitions for writs of habeas corpus and discovery motions. I am assigned to more than eight death penalty cases.

4. On February 9, 2012 Respondents filed a Opposition to Motion to Alter of Amend Judgment (Docket No. 263).

5. Due to a variety of issues, I am unable to respond to Respondent's pleadings within the time period established by the Court.

6. I just completed a comprehensive Motion for Stay and Abeyance in McKenna v. McDaniel, Case No. 2:11-CV-00191-JCM-PAL which was filed on February 16, 2012.

7. I filed a Motion to Alter or Amend Judgement (Rule 59(e)) in this case on January 24, 2012.

8. Respondents filed their Opposition to Motion to Alter or Amend Judgment on February 9, 2012.

9. I have started a reply to respondent's Opposition to Motion to Alter or Amend Judgment in this case, but it is not yet completed.

10. I contacted Heather Procter of the Nevada Attorney General's Office, respondents' attorney, today and she does not oppose this request for an extension of time.

11. I am requesting an extension of time to complete Mr. Adams' responsive pleadings of at least fourteen (14) days from the date it is currently due. I assure the Court that I am focused on meeting this deadline and my desire is to file the responsive pleadings earlier if possible.

1 12. This request is not made merely for the purpose of delay, but is made in order
2 to provide the Court with cogent and adequate argument, to ensure adequate representation
3 of Mr. Adams' interests, and to comply with my duty to provide competent representation
4 in this and my other capital cases. Nev. R. Prof. Conduct 1.1.

5 I declare under the penalty of perjury through the laws of the State of Nevada that the
6 foregoing is true and correct and that this document was executed at Las Vegas, Nevada on
7 the 17th day of February, 2012.

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9 /s/ Gary Taylor
 Gary Taylor

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18 IT IS SO ORDERED
19 FEB 21, 2012

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21 United States District Judge
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CERTIFICATE OF ELECTRONIC SERVICE

In accordance with Rule 5(b)(2)(E) of the Federal Rules of Civil Procedure, the undersigned hereby certifies that on the 17th day of February, 2012, a true and correct copy of the foregoing UNOPPOSED MOTION FOR ENLARGEMENT OF TIME was served by the United States District Court, CM/ECF electronic filing system to:

Catherine Cortez Masto
Nevada Attorney General
Heather D. Procter
Assistant Attorney General
Email: Hprocter@ag.nv.gov

/s/ Katrina Manzi
An employee of the Federal Public Defender